

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE LOWER MANHATTAN
DISASTER SITE LITIGATION

21 MC102 (AKH)

NOTICE TO PRODUCE DOCUMENTS
PURSUANT TO FEDERAL RULE OF
CIVIL PROCEDURE 34

To: 1 Wall Street/ BNY (Bank of NY) "entities"
c/o Robert R. Rigolosi, Esq.
Segal McCambridge Singer & Mahoney, Ltd.
850 Third Avenue, Ste 1100;
New York, NY 10022,
rrigolosi@smsm.com

PLEASE TAKE NOTICE, pursuant to Rule 34 of the Federal Rules of Civil Procedure, Gregory J. Cannata & Associates, attorneys for plaintiffs in the above-captioned matter, requests the above referenced defendant to respond within thirty (30) days to the following demands for document production with reference to 1 Wall Street, as referenced in the deposition of THADDEUS SUMMER LOGAN, on September 7th, 2012, at or about page as referenced below. To the extent records were already exchanged, please provide the bates numbers of the requested record(s) on Merril Lextranet.

1. A hard copy and/or digital copy of the final report prepared by LawGibb with regards to the work at One Wall Street, as requested on or about page 56 in the above referenced deposition.
2. Un-redacted copies of all discovery previously produced by BNY One Wall Street, as requested on or about page 175 in the above referenced deposition.

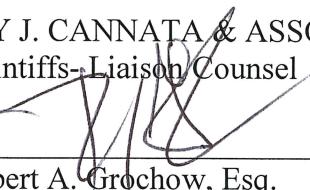
3. All copies of all redacted records produced by BNY One Wall Street in their un-redacted form as requested on or about page 224 in the above referenced deposition.
4. Copies of all of the items that were included on the privileged log including, but not limited to the final report and interim reports prepared by LawGibbs in conjunction with the BNY. Copies of the following: any cleaning protocols that may have been in the possession of BNY as received from and/or prepared by LawGibbs or in conjunction with BNY, a list of all the insurance carriers that had an involvement in the post 9/11 project, and any scope of work and complete contracts between BNY and Trade Winds Environmental, and BNY and LawGibbs as requested on or about page 225 in the above referenced deposition.

Plaintiffs reserve their rights to supplement this Notice and/or service additional Notices throughout the course of this litigation

Dated: New York, New York
February 27 , 2013

GREGORY J. CANNATA & ASSOCIATES
Plaintiffs-Liaison Counsel

By: _____


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